

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KIRSTEN CURLEY, individually and on behalf of similarly situated individuals,

Plaintiff,

v.

VEROGEN, INC.,

Defendant.

Case No. 24-cv-9508

Hon. Edmond E. Chang

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Verogen, Inc. (“Verogen”), by its counsel and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby moves for an extension of time to answer or otherwise respond to Plaintiff’s Complaint through and including November 5, 2024. In support thereof, Defendant states as follows:

1. On August 30, 2024, Plaintiff Kirsten Curley filed a class action complaint in the Circuit Court of Cook County, No. 2024-CH-08282.
2. Defendant Verogen was served with a copy of the summons and Complaint on September 4, 2024.
3. On October 4, 2024, Defendant timely removed the case to this Court on the bases of diversity jurisdiction and CAFA. *See* ECF No. 1.
4. Defendant’s responsive pleading is currently due on October 11, 2024.
5. Defendant requests an extension of time, up to and including November 5, 2024, to answer or responsively plead to Plaintiff’s Complaint and to provide Defendant’s counsel adequate

time to continue their investigation into Plaintiff's claims and prepare the appropriate responsive pleading.

6. On October 2, 2024, the parties conferred via email regarding this case and the instant request and Plaintiff's counsel does not oppose the relief sought herein.

7. This motion is brought in good faith and not for purpose of undue delay. This is Defendant's first request for an extension of time to answer or respond to Plaintiffs' Complaint. Granting the motion will not prejudice either party.

WHEREFORE, Defendant Verogen, Inc. respectfully requests the Court grant its Motion for an Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint, and enter an Order reflecting that Defendant shall answer or otherwise respond to Plaintiff's Complaint on or before November 5, 2024, and order all further relief as is reasonable and just.

DATED: October 7, 2024

Respectfully submitted,

By: /s/ Paul Yovanic, Jr.
One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2024, a true and correct copy of the foregoing document was filed with the Clerk of the Court using the CM/ECF system, and that a true and correct copy of the same was served on the following via electronic mail:

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/s/ Paul Yovanic, Jr.